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State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF ENVIRONMENTAL RESPONSE AND REMEDIATION

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ERRC-463-94

October 19, 1994



Mr. Peter D. Stevenson U.S. EPA, Region VIII 999 18th Street, Suite 500 Denver, Colorado 80202-2405

Re: Review of the "Preferred Plan Remediation Report" for the Leeds Silver Reclamation site.

Dear Mr. Stevenson:

Thank you for the opportunity to review the "Preferred Plan Remediation Report" for the Leeds Silver Reclamation site. Although the plan does not provide the level of detail needed for a thorough review of the proposed actions, the Utah Division of Environmental Response and Remediation (DERR) generally agrees with the approach for site cleanup outlined therein and in the corresponding cover letter.

The letter indicates that capping the heap-leach pile in place utilizing a geosynthetic liner was selected as the preferred cleanup option. The DERR has some concern over the permanence, or effective-life of this option. The plan also calls for a high-power wash of the asphalt. The DERR questions whether it would be feasible instead to remove the asphalt cover and place it in the heap-leach pile prior to capping.

Please forward to DERR any further plans or designs for this project as they become available. The DERR would like to maintain meaningful and substantial involvement in the cleanup activities at this site, however, budget constraints may preclude this. Continue to direct any correspondence or questions to Jason Knowlton at 536-4100.

Sincerely,

Brad T Johnson, CERCLA Branch Manager

Division of Environmental Response and Remediation

BTJ/JK/ss

cc: Wayne Hedburg, Utah Division of Oil, Gas and Mining Wayne Thomas, UDEQ District Engineer